

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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U.S. DEPARTMENT OF JUSTICE
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JERBEIN MEJIA, :
Petitioner, :
v. : Case No. C-1-01-688
DON DEWITT, WARDEN, : Judge Arthur S. Spiegel
Respondent. : Mag. Judge Jack Sherman
:

MOTION FOR EXTENSION OF TIME IN WHICH TO FILE TRAVERSE

Jerbein Eligio Mejia
Inmate No. A391-808-00
Ross Correctional Institute
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PETITIONER AND COUNSEL PRO SE

Bruce D. Horrigan (0047170)
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Now comes, Jerbein Mejia, Petitioner, pro se, and hereby respectfully moves this Honorable Court for its ORDER granting him an additional thirty (30) days in which to file his traverse in response to the state's answer to writ.

Pursuant to Local Civil Rule 6.1 (b) a party may receive an extension of time in which to file a pleading for good cause shown. In this instance, the Petitioner is unable to read or write in the English language, and wholly depends upon the assistance of others for the preparation of his legal documents. Additionally, the Petitioner is housed in a "close" security prison which provides limited access to the law library, because of very controlled movements in the camp. And the library itself has nothing but the most basic reference material, thus quite often material must be acquired through outside sources, which

this Court must understand is time consuming to say the least.

Petitioner was served with and signed for his copy of the state's return to writ on September 8, 2003, therefore, the ten (10) days in which he would have to reply would end on September 18, 2003, so Petitioner requests that the thirty (30) days requested begin on September 18, 2003 and end on October 17, 2003.

WHEREFORE, it is prayed by the Petitioner that the relief requested in the within motion be in all respects granted, and for any other and further relief that this Honorable Court deems just and appropriate.

Respectfully submitted,

Jerbein Mejia
Jerbein Mejia, Petitioner
Counsel Pro Se

CERTIFICATE OF SERVICE

A true copy of the foregoing Motion For Extension Of Time In Which To File Traverse was served upon Bruce D. Horrigan, Assitsant Attorney General, Corrections Litigation Section, State Office Building, 11th Floor, 615 West Superior Avenue, Cleveland, Ohio 44113-1899 and William R. Gallagher, counsel for Petitioner, The Citadel, 114 East Eighth Street, Cincinnati, Ohio 45202 by U.S. regular mail, postage pre-paid this 11th day of September, 2003.

Jerbein Mejia
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